

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

EMILY TEMAN, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

INTAKE DESK LLC

Defendant.

Case No. 1:25-cv-10647-MJJ

Plaintiff's Unopposed Motion for Extension of Time

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 7.1(a)(2), Plaintiff Emily Teman (“Plaintiff”) respectfully moves the Court for a twenty-one (21) day extension of time to file her memorandum in opposition to Defendant Intake Desk LLC’s Motion to Dismiss, such that Plaintiff’s opposition will be due on to July 16, 2025. In support, Plaintiff states as follows:

1. On March 19, 2025, Plaintiff filed her Class Action Complaint. Dkt 1.
2. On April 11, 2025, Defendant Intake Desk LLC (“Defendant”) filed an Unopposed Motion for Extension of Time to Respond to Plaintiff’s Complaint—requesting an extension of thirty (30) days. Dkt. 7.
3. The Court granted Defendant’s motion on April 15, 2025. Dkt. 8.
4. On May 14, 2025, Defendant filed its Motion to Dismiss. Dkt. 14.
5. Plaintiff filed a First Amended Complaint on May 28, 2025. Dkt 15.
6. On June 11, 2025, Defendant filed its Motion to Dismiss the Amended Complaint. Dkt. 17.
7. Pursuant to Local Rule 7.1(b)(2), Plaintiff’s opposition is due June 25, 2025.
8. Plaintiff requests additional time due to overlapping court deadlines and because

Defendant's motion raises issues in a developing area of law under the Telephone Consumer Protection Act, including recent decisions such as *Hulce v. Zipongo Inc.*, 132 F.4th 493, 496 (7th Cir. 2025) and *Rockwell v. Medicus Healthcare Solutions*, No. 24-CV-128, 2025 WL 959745 (W.D.N.Y. Mar. 31, 2025).

9. This is Plaintiff's first request for an extension of this deadline.

10. The requested extension is not sought for purposes of delay and will not prejudice the parties or the Court.

11. Plaintiff's counsel conferred with defense counsel prior to filing the instant motion, and Defendant does not oppose the requested extension. Accordingly, good cause exists to grant Plaintiff's request.

LOCAL RULE 7.1(a)(2) CERTIFICATION

Pursuant to Local Rule 7.1(a)(2), counsel for Plaintiff certifies that they conferred with counsel for Defendant regarding the relief requested in this motion. Defendant does not oppose the requested extension.

WHEREFORE, Plaintiff hereby requests that the Court enter an order extending Plaintiff's deadline—to submit her memorandum in opposition to Defendant's Motion to Dismiss—by twenty-one (21) days from June 25, 2025, to July 16, 2025.

Date: June 18, 2025

Respectfully submitted,

By: /s/ Cassandra P. Miller
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Attorneys for Plaintiff and the Proposed Class

CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2025, this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

By: /s/ Cassandra P. Miller
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